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1 2 3 4 5 6 7 C	DAVID G. BANES, Esq. O'Connor Berman Dotts Second Floor, Nauru Bu P.O. Box 501969 Saipan, MP 96950 Telephone No. (670) 234-Facsimile No. (670) 234-SACTORY Attorneys for Plaintiff Joseph DLR Gonzales	& Banes ilding -5684 5683 IN THE S		Dist AUC For The North By (De	LED Clerk rict Court 1 5 2007 em Mariana Islands puty Clerk)	
9	JOSEPH DLR GONZAI	LES,) CIVIL CASE	NO. 07-	0026	
10 11 12 13 14	Plaintiff, vs. ROBERT MARC WEIN Defendant.	·))) COMPLAINT) FOR JURY TF)))			
16 17 18 19	COMES NOW Jos states and alleges as follow	•	es, by and through cou	insel, and f	or his Complaint	
21	JURISDICTION AND PARTIES					
23	1. This Court has jurisdiction over this matter pursuant to the provisions of the					
:4	Constitution and laws of the Commonwealth of the Northern Marianas Islands ("CNMI"),					
25	including the Judicial Reorganization Act of 1989 as amended.					
27	2. Plaintiff Jo	seph DLR Gonza	les ("Mr. Gonzales") i	s a citizen	of the United States	
28	of America residing in the	Commonwealth	of the Northern Marian	na Islands.		

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8. The force of the impact caused the car Mr. Gonzales was driving to spin around and face south and resulted in the car being severely damaged. An ambulance was called and Mr. Gonzales was taken to the Commonwealth Health Center where he was treated.

- 9. Mr. Weinberg, with deliberate disregard and reckless indifference to the safety of others, recklessly, grossly, negligently and carelessly operated his car and failed to keep a proper look out for other users of the road including Mr. Gonzales, all in violation of the CNMI's vehicular laws, so that his vehicle collided with Mr. Gonzales' vehicle, proximately causing the Mr. Gonzales' injuries and damages complained of herein (the "accident").
- 10. At all times herein mentioned, Mr. Gonzales exercised all due care and caution for his safety and the safety of others.

CAUSES OF ACTION FIRST CLAIM FOR RELIEF: NEGLIGENCE

- 11. Plaintiffs re-allege and incorporate herein in paragraphs 1 through 10.
- 12. As a proximate result of the deliberate disregard of and reckless indifference to the safety of others and gross negligence of Mr. Weinberg and his failure to comply with the CNMI traffic rules, including failing to keep a proper look-out, Mr. Gonzales suffered physical injuries requiring the services of physicians, nurses, and other medical and rehabilitative personnel, all to his damage in an amount to be proven at trial. At the time of the filing of this Complaint, Mr. Gonzales continues to suffer from pain as a result of the accident, and his damages continue to accrue in amounts to be proven at trial.

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1	13. As a further proximate result of the recklessness and gross negligence of Mr.				
2	Weinberg, Mr. Gonzales has suffered property damages in amounts which continue to accrue				
3	and which will be proven at trial. Mr. Gonzales also suffered property damages, lost wages				
4	future earnings and earning capacity in an amount which will be proven at trial.				
5					
6	14. As a further and proximate result of the recklessness and negligence of Mr.				
7	Weinberg, Mr. Gonzales suffered and continues to suffer severe and permanent physical and				
8	mental pain and anguish, all to his damage in an amount to be proven at trial.				
9					
10	PRAYER FOR RELIEF				
11					
12	WHEREFORE, Plaintiff prays for relief as follows:				
13					
14	a. For general and special damages in an amount to be proven at trial;				
15	b. For an award of punitive damages;				
16	c. For pre-judgment and post-judgment interest as allowed by law;				
17	d. For costs of suit herein; and				
18	e. For such other and equitable relief as this Court deems just and proper.				
19					
20	DEMAND FOR JURY TRIAL				
21					
22	Plaintiffs hereby demand a jury trial with respect to all issues so triable.				
23					
24	Date: August 1, 2007. O'CONNOR BERMAN DOTTS & BANES Attornous for Plaintiff Joseph DLR Gonzales				
25	Attorneys for Plaintiff Joseph DLR Gonzales				
26					
27	By: DAVID G. BANES (F0171)				

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